

## **Exhibit 3**

Ms. Francoise Culley-Trotman

CURRICULUM VITAE

**PROFESSIONAL SUMMARY**

***CULLEY WAGNER, LLC-Compliance Solutions***  
***Principal and Managing Partner***

I have more than 15 years of regulatory compliance experience and have served in the role of Chief Compliance Officer for 3 different health plans with direct responsibility for CMS and State contractual requirements including audits and remediation plans.

- Specializes in the development of Compliance & Business Ethics programs for health plans including the creation and implementation of regulatory, ethics, privacy, and human resources training programs nationally.
- Provides Medicare Advantage and Part D compliance audit services for Medicare and Managed Care Health Plans, Pharmacies, Pharmacy Benefit Management Companies (PBM), Independent Physician Offices and Hospitals
- Develop and implement compliance monitoring tools and programs for Vendors, Third Party Administrators and First Tier, Downstream and Related Entities
- Leads and performs compliance risk assessments & process re-engineering for health plans, delegated entities, pharmacies and medical facilities.
- Serve as Medicare and Medicaid subject matter expert for legal teams that represent health plans, PBMs and pharmaceutical companies
- Performs KYC/due diligence for healthcare entity business acquisitions
- Current Clients include health plans, healthcare facilities and Third Party Administrators.

**PRIOR PROFESSIONAL EXPERIENCE**

2012-2013

UNIVERSAL HEALTHCARE INC.

***Chief Compliance Officer***

- Recruited to remediate failing compliance program and operational areas.
- Re-engineered all elements of the compliance program within 90 days of hire;
- Implement FDR/Subcontractor Compliance Program – vendor seminars
- Launched enhanced Compliance Program Training – live interactive format
- Implemented Compliance newsletter as part of Compliance Program “branding”
- Added Financial Recovery function to Medicare Fraud Waste and Abuse Unit
- Launched inaugural Corporate Compliance Committee & Policy & Procedure sub-committee- new policy portal

*Francoise Culley-Trotman - Professional Experience Continued*

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2011- 2012

**QHP NEW YORK, INC.**

*Chief Compliance Officer*

- Successfully deployed compliance program and lead company remediation of deficiencies as a condition of release from CMS sanctions
- Planned & executed audits, lead executive meetings with CMS Central Office leadership
- Provided advisory to Board of Directors (health plan & parent company) on fiduciary duties
- Implemented and monitored subcontractor oversight program (100% participation from all vendors)
- One of 18 health plan representatives selected to contribute to revised CMS audit protocols published August 2012

2007-2011

**WELLCARE HEALTH PLANS, INC.**

*Senior Director, Corporate Compliance Audit & Oversight*

- Rehired to implement Medicare and Medicaid compliance program for seven states. Successfully managed implementation of corrective action plans as a condition of health plan release from CMS sanctions
- Project managed compliance deliverables issues as a result of a Corporate Integrity Agreement along with General Counsel, Advisors to the Board and CCO
- Authored an industry-standard Compliance Audit & Monitoring Program, including review/approval of 3,400+ policies, conducts annual focused audits, and expanded the role of Compliance Auditing
- Lead the implementation of an Enterprise Risk Management tool to manage federal, legal , regulatory and contractual requirements
- Standardized Board reports to include Compliance Contractual Investigations Metrics and Contractual Performance Metrics

2006-2007

**PARTNERCARE HEALTH PLAN, INC.**

*dba MD Medicare Choice*

*Chief Compliance Officer & Privacy Officer*

- Responsible for implementation of Medicare and Medicaid compliance programs and HIPAA Compliance Program
- Developed and managed the corporate compliance program, relationships with various organizations, the audit program, URAC/NCQA Accreditation, and other reviews.
- Responsible for all legal agreements and maintained corporate books, regulatory reports, statutory filings, and corporate transactions
- Compliance oversight of Vendor Compliance Program- including 900 + medical services and administrative providers and downstream entities

Ms. Francoise Culley-Trotman

## CURRICULUM VITAE

2005-2006

### **WELLCARE HEALTH PLANS INC.**

#### ***Corporate Compliance Auditor***

- Recruited to develop a Compliance Audit Program for new compliance department. Responsible for developing corporate compliance protocols to monitor and audit key functional areas, including Medicaid and Medicare state contract compliance.
- Leveraged large corporate experience to partner with Compliance Officer to create Compliance Department and Compliance Audit Program

2000-2005

### **JPMORGAN CHASE**

#### ***Risk Review Officer***

- Provided risk and compliance advisory and training for 10 new and emerging cash management and credit card lines of business (Europe/Asia/US)
- Developed and conducted audits, managed SOX 404/302 compliance, Key Performance/Risk Indicators, and managed Risk Controls Self Assessment Process for a \$2B portfolio.
- Subject matter expert for M&A activities; conducted due diligence for the acquisition of a \$10M EBT card service which services 37 state agencies
- Coordinated the delivery of staff training on ongoing fraud and loss prevention, anti-money laundering (AML), changes to regulatory guidance.

## **PROFESSIONAL MEMBERSHIPS**

- HealthCare Compliance Association
- Society of Corporate Compliance and Ethics

## **INDUSTRY PRESENTATIONS**

- Presentation - Partnering with your SIU for Strategic and Tactical Compliance. Health Care Compliance Association Managed Care Compliance Conference, Phoenix AZ, February 24-26, 2013,
- Presentation- Planning and Surviving a CMS Audit, IIR USA Medicare Advantage Special Needs Plan Conference, Washington DC, July 14-16, 2008

## **ACADEMIC**

University of London GCE (1990)

University of Guyana/UWI | Bachelor of Laws LL.B. (1996)